

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Vadim Wolfson's Motion *in Limine* to Exclude Government's Proposed Expert Testimony, the Declaration of David C. Rybicki, dated March 28, 2025, and all other papers and proceedings herein, Defendant Vadim Wolfson will move this Court, before the Honorable Gregory H. Woods, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on the date and time to be set by the Court, for an Order granting Defendant Vadim Wolfson's Motion *in Limine* to Exclude Government's Proposed Expert Testimony and such other fair and equitable relief as may be appropriate.

PLEASE TAKE FURTHER NOTICE that Defendant Gannon Bond respectfully joins in this Motion of co-defendant Vadim Wolfson.

Dated: March 28, 2025

/s/ David C. Rybicki

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